

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
ANDERSON DIVISION**

Jane Roe and James Roe, individually and as parents, natural guardians, and next friend of minor child, John Doe,

Plaintiffs,

vs.

Singleton Investment Properties, LLC,
Whetstone Academy, LLC, and John Singleton,

Defendants.

C/A No. 8:25-cv-00318-BHH

**DEFENDANT SINGLETON
INVESTMENT PROPERTIES, LLC'S
ANSWERS TO LOCAL CIVIL RULE
26.01 INTERROGATORIES**

Pursuant to Rule 26.01 of the Local Civil Rules of the United States District Court for the District of South Carolina, Defendant Singleton Investment Properties, LLC ("Defendant") hereby submits the following answers to interrogatories as required by the Court:

(A) State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of that interest.

ANSWER:

Defendant is unaware of any subrogation interests.

(B) As to each claim, state whether it should be tried jury or nonjury and why.

ANSWER:

This matter is an action at law for alleged personal injury and thus should be tried by jury.

(C) State whether the party submitting these responses is a publicly-owned company and separately identify (1) any parent corporation and any publicly held corporation owning ten percent (10%) or more of the party's stock; (2) each publicly-owned company of which it is a

parent; and (3) each publicly owned company in which the party owns ten percent (10%) or more of the outstanding shares.

ANSWER:

Defendant is not a publicly traded company.

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). *See Local Civ. Rule 3.01 (D.S.C.).*

ANSWER:

The division is appropriate as it is where Defendant is located.

(E) Is this action related in whole or in part to any other matter filed in this district, whether civil or criminal? If so, provide (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases that may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the clerk of court based on a determination of whether the cases arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

ANSWER:

No.

(F) [*Defendants only.*] If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

ANSWER:

Defendant is properly identified.

(G) [Defendants only.] If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of their liability.

ANSWER:

Defendant makes no such contention at this time but reserves the right to do so at a later date.

(H) *Parties or Intervenors in a Diversity Case.* In an action in which jurisdiction is based on diversity under 28 U.S.C. § 1332(a), a party or intervenor must, unless the court orders otherwise, name – and identify the citizenship of – every individual or entity whose citizenship is attributed to that party or intervenor. This response must be supplemented when any later event occurs that could affect the court’s jurisdiction under § 1332(a).

ANSWER:

Plaintiffs are citizens and residents of the State of California. Defendant Singleton Investment Properties, LLC is a limited liability company organized and existing under the laws of the State of South Carolina with its principal place of business in Oconee County, South Carolina.

s/Gray T. Culbreath

Gray T. Culbreath, Fed. ID No. 5647
Gallivan, White & Boyd, P.A.
Post Office Box 7368
Columbia, SC 29202
gculbreath@gwblawfirm.com
(803) 779-1833

Attorney for Defendant Singleton Investment Properties, LLC

May 6, 2025